

REMARKS/ARGUMENTS

The Applicants have carefully considered this application in connection with the Examiner's Action and respectfully request reconsideration of this application in view of the following remarks.

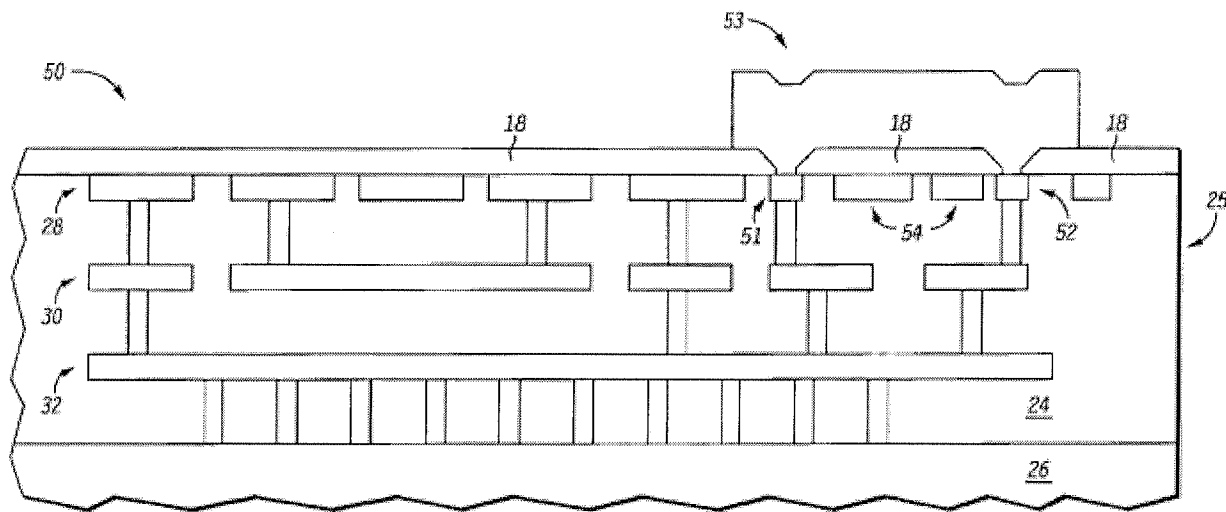
The Applicants originally submitted Claims 1-25 in the application. In a previous response to a restriction requirement, the Applicants withdrew Claims 17-25. In previous responses to Examiner's actions, the Applicants canceled Claims 7 and 17-25 and added new Claims 26-28. Presently, the Applicants have not amended, canceled nor added any claims. Accordingly, Claims 1-6, 8-16 and 26-28 are currently pending in the application.

I. Rejection of Claims 1-4, 6, 8-10, 12-16, and 26 under 35 U.S.C. §102

The Examiner has rejected Claims 1-4, 6, 8-10, 12-16, and 26 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,614,091 to Downey, *et al.* ("Downey"). Independent Claim 1 includes the element that a second interconnect structure is connected to a contact pad, wherein a portion of the second interconnect structure is disposed in the bond pad level, the second interconnect structure being in physical contact with the multiple first interconnect structures located within the dielectric layer. On the other hand, independent Claim 12 includes the element that a second interconnect structure is coplanar with at least one of the plurality of contact pads and electrically connected thereto, the second interconnect structure comprising a plurality of conductive elements physically contacting the multiple first interconnect structures. Thus, Claims 1 and 12, in one form or another, require that the second interconnect structure contact a contact pad and at least

two first interconnect structures. Accordingly, the claimed second interconnect structure must contact at least three features.

Downey fails to disclose the claimed second interconnect structure. Namely, the feature (e.g., **53**) that the Examiner asserts is a second interconnect structure only contacts two other features (e.g., **51**, **52**), and not three features as is claimed. Accordingly, Downey fails to disclose this element.



Therefore, Downey does not disclose each and every element of the claimed invention and as such, is not an anticipating reference. Because Claims 2-4, 6, 8-10, 13-16, and 26 are dependent upon Claims 1 and 12, Downey also cannot be an anticipating reference for Claims 2-4, 6, 8-10, 13-16, and 26. Accordingly, the Applicants respectfully request the Examiner to withdraw the §102 rejection with respect to these Claims.

II. Rejection of Claims 5 and 27-28 under 35 U.S.C. §103

The Examiner has rejected Claims 5 and 27-28 under 35 U.S.C. §103(a) as being unpatentable over Downey in view of U.S. Patent No. 6,979,896 to Seshan ("Seshan"). As previously indicated, independent Claims 1 and 12, in one form or another, require that the second interconnect structure contact a contact pad and at least two first interconnect structures. As previously established, Downey fails to disclose this element. Downey further fails to suggest this element. Specifically, Downey fails to suggest this element because Downey only teaches that its second interconnect structure (e.g., **53**) only contacts two other features (e.g., **51**, **52**), and not three features as required by the claims.

Seshan fails to correct the deficiencies of Downey. The Examiner is offering Seshan for the sole proposition that the second interconnect structure may be a power bus and further that the contact pad is configured for connection external to the device by a solder bump. Without even addressing whether the Examiner's assertions are correct, a teaching that the second interconnect structure may be a power bus and further that the contact pad is configured for connection external to the device by a solder bump is quite different from a teaching or suggestion that a second interconnect structure contact a contact pad and at least two first interconnect structures, as is presently claimed. Accordingly, Seshan also fails to teach or suggest such an element.

Thus, Downey, individually or in combination with Seshan, fails to teach or suggest the invention recited in independent Claims 1 and 12 and their dependent claims, when considered as a whole. The combination, therefore, must fail to establish a prima facie case of obviousness with respect to these claims. Claims 5 and 27-28 are therefore not obvious in view of the combination.

In view of the foregoing remarks, the cited references do not support the Examiner's rejection of Claims 5 and 27-28 under 35 U.S.C. §103(a). The Applicants therefore respectfully request the Examiner withdraw the rejection.

III. Rejection of Claim 11 under 35 U.S.C. §103

The Examiner has rejected Claim 11 under 35 U.S.C. §103(a) as being unpatentable over Downey in view of Applicant's Admitted Prior Art ("AAPA"). As previously indicated, independent Claims 1 and 12, in one form or another, require that the second interconnect structure contact a contact pad and at least two first interconnect structures. As previously established, Downey fails to teach or suggest this element.

AAPA fails to correct the deficiencies of Downey. The Examiner is offering AAPA for the sole proposition that a barrier material may separate copper and aluminum within an IC. Without even addressing whether the Examiner's assertion is correct, a teaching that a barrier material may separate copper and aluminum within an IC is quite different from a teaching or suggestion that a second interconnect structure contact a contact pad and at least two first interconnect structures, as is presently claimed. Accordingly, AAPA also fails to teach or suggest such an element.

Thus, Downey, individually or in combination with AAPA, fails to teach or suggest the invention recited in independent Claims 1 and 12 and their dependent claims, when considered as a whole. The combination, therefore, must fail to establish a prima facie case of obviousness with respect to these claims. Claim 11 is therefore not obvious in view of the combination.

In view of the foregoing remarks, the cited references do not support the Examiner's rejection of Claim 11 under 35 U.S.C. §103(a). The Applicants therefore respectfully request the Examiner withdraw the rejection.

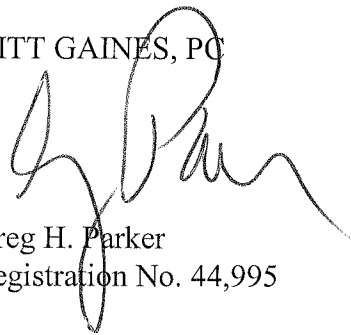
IV. Conclusion

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-6, 8-16 and 26-28.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,

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